

December 16, 2003

Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive S.W. P.O. Box 47250 Mail Stop FY-1 1/7250 Olympia, WA 98504-7250

Attention:

Carole Washburn

Executive Secretary

Pursuant to Washington law, including Sections 80.28.050 and 80.28.060 of the Revised Code of Washington and the Commission's Rules and Regulations, PacifiCorp (dba Pacific Power & Light) transmits herewith for filing and approval by the Commission an original and three legislative copies of revised tariff sheets applicable to electric service supplied by the Company in the state of Washington to become effective on January 16, 2004. Also enclosed pursuant to WAC 480-09-330(1) are twenty (20) copies of the complete filing, one copy of the testimony and exhibits in electronic format, one copy of the Company's FERC Form 1, and 10Ks, 10Qs and prospectuses for the most recent two years.

PacifiCorp hereby requests an increase in revenues from Washington operations resulting in an overall price change of 13.5% or \$26.7 million.

The proposed tariff sheets are contained in Exhibit No. (WRG-2) accompanying this filing. The filing is based upon a test period consisting of the twelve months ended March 31, 2003.

The Company agrees that upon suspension of its tariff filing, it will provide notice pursuant to WAC 480-100-197. Accordingly, the notice provisions of WAC 480-100-194 are not required for this filing. Attached as Attachment A is a listing of the tariff sheets proposed to be revised.



Washington Utilities and Transportation Commission December 16, 2003 Page 2

It is respectfully requested that all formal correspondence and Staff requests regarding this matter be addressed to:

By E-mail (preferred):

datarequest@pacificorp.com.

By Fax:

(503) 813-6060

By regular mail:

Data Request Response Center

PacifiCorp

825 NE Multnomah, Suite 800

Portland, OR 97232

In addition, please send copies of correspondence and communication in regard to this matter to:

Christy Omohundro

Vice President, Regulation

PacifiCorp

825 NE Multnomah, Suite 800

Portland, OR 97232

Telephone:

(503) 813-6065

FAX:

(503) 813-6060

James M. Van Nostrand

Stoel Rives LLP

Suite 3600, One Union Square

600 University Street Seattle, WA 98101

Telephone:

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(206) 386-7500

Stephen C. Hall Stoel Rives LLP

900 S.W. Fifth Ave., Suite 2600

Portland, OR 97204

Telephone:

(503) 294-9625

Fax No.

In Omolour do

(503) 220-2480

Sincerely,

Christy Omohundro Vice President

Regulation

Enclosures

cc w/enc: All Parties of Record

The proposed tariff sheets to be revised in the Company's currently effective Tariff WN-U-74 are designated as follows:

Twelfth Revision of Sheet No. B Seventh Revision of Sheet No. 15.1 Tenth Revision of Sheet No. 16 Sixth Revision of Sheet No. 17.1 Fifth Revision of Sheet No. 18.1 Fifth Revision of Sheet No. 24.1 Thirteenth Revision of Sheet No. 24.2 Original Sheet No. 24.3 Seventh Revision of Sheet No. 36.1	Tariff Index Schedule 15 Schedule 16 Schedule 17 Schedule 18 Schedule 24 Schedule 24 Schedule 24 Schedule 36	Outdoor Area Lighting Service Residential Service Low Income Bill Assistance Three Phase Residential Service Rider Small General Service Small General Service Small General Service Large General Service – Less Than 1,000 kW
Ninth Revision of Sheet No. 36.2	Schedule 36	Large General Service – Less Than 1,000 kW
Third Revision of Sheet No. 36.3	Schedule 36	Large General Service – Less Than 1,000 kW
Tenth Revision of Sheet No. 40.1 Twelfth Revision of Sheet No. 40.2 Pumping Service	Schedule 40	Agricultural Pumping Service Schedule 40 Agricultural
Original Sheet No. 40.3	Schedule 40	Agricultural Pumping Service
Seventh Revision of Sheet No. 48T.1	Schedule 48T	Large General Service – Metered Time of Use 1,000 kW and Over
Seventh Revision of Sheet No. 51.1	Schedule 51	High Pressure Sodium Vapor Street Lighting Service
Seventh Revision of Sheet No. 52	Schedule 52	Street Lighting Service Company- Owned System
Seventh Revision of Sheet No. 53	Schedule 53	Street Lighting Service Customer- Owned System
Seventh Revision of Sheet No. 54.1		Schedule 54 Recreational Field Lighting – Restricted
Seventh Revision of Sheet No. 57.1	Schedule 57	Mercury Vapor Street Lighting Service – No New Service
Seventh Revision of Sheet No. 57.2	Schedule 57	Mercury Vapor Street Lighting Service – No New Service
Original Sheet No. 96	Schedule 96	Adjustment Associated with the Aquila Hydro Hedge

NOTICE

PACIFICORP (d.b.a. Pacific Power & Light Company)

Pursuant to Washington Law, including Sections 80.28.050 and 80.28.060 of the revised code of Washington and the Commission's Rules & Regulations, PacifiCorp has filed with the Commission revised tariff schedules for electric service in the State of Washington.

PacifiCorp is requesting an increase in revenues from Washington operations resulting in an overall price change of 13.5% or \$26.7 million.

A complete public file of the proposed tariff sheets of the Company, applicable to this territory, is maintained at the following locations and may be examined by any person or his agent upon request and without the assignment of any reason. A representative of the Company will provide any information requested as to such tariff schedule.

Walla Walla Service Center G & Douglas	Yakima Service Center 1101 N. 16 th Avenue	Sunnyside Service Center 409 West Lincoln
Walla Walla, WA 99362	Yakima, WA 98902	Sunnyside, WA 98944
(509) 522-7019	(509) 575-3135	(509) 839-0197

The Washington Utilities and Transportation Commission will examine the Company's proposed tariff sheets. As a result of such examination, the Commission may determine that any or all of said schedules should be accepted as filed, modified or rejected.

Unless suspended by the Commission, these tariff sheets will become effective January 16, 2004.

DATE: December 16, 2003

PACIFICORP

Christy Omobundro

Vice President, Regulation

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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION,)	
Complainant,)))	DOCKET NO. UE-03
VS.)	
)	APPLICATION
PACIFICORP dba Pacific Power & Light)	
Company,)	
)	
Respondent.)	
)	

Pursuant to RCW 80.28.050, RCW 80.28.060, and as permitted by the Commission's Sixth Supplemental Order: Denying Petition for Accounting Order; Rejecting Tariff Filing; Authorizing Subsequent Filing, Docket No. UE-020417, PacifiCorp dba Pacific Power & Light Company ("PacifiCorp" or "the Company") hereby files a general rate case to revise its tariff schedules to adjust prices for its Washington electric customers. Included in this filing is a proposal for inter-jurisdictional cost allocation, upon which the Company's revenue requirement calculations are based.

- 1. PacifiCorp is an electrical company and public service company in the State of Washington within the meaning of RCW 80.04.010, and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to retail customers in Washington. PacifiCorp provides electric service to approximately 124,000 retail customers in the State of Washington and approximately 1.45 million total retail customers in Washington, California, Idaho, Oregon, Utah, and Wyoming. The Company's principal place of business is Portland, Oregon.
 - 2. Communications regarding this filing should be addressed to:

Christy Omohundro Vice President, Regulation PacifiCorp 825 NE Multnomah, Suite 800 Portland, OR 97232

Telephone: (503) 813-6092 Facsimile: (503) 813-6060

Email: christy.omohundro@pacificorp.com

and

James M. Van Nostrand Stoel Rives LLP Suite 3600, One Union Square 600 University Street Seattle, WA 98101 Telephone: (206) 386-7665 Facsimile: (206) 386-7500

Email: jmvannostrand@stoel.com

Stephen C. Hall Stoel Rives LLP 900 SW Fifth Avenue, Suite 2600 Portland, OR 97204 Telephone: (503) 294-9625

Facsimile: (503) 220-2480 Email: schall@stoel.com

Communications regarding discovery matters, including data requests issued to PacifiCorp, should be addressed to:

Data Request Response Center PacifiCorp 825 NE Multnomah, Suite 800 Portland, OR 97232 Email: datarequest@pacificorp.com

- 3. PacifiCorp is currently earning a normalized rate of return of approximately 5.63 percent in Washington. In an effort to achieve a level of earnings in Washington that reflects the Company's current estimated cost of equity capital and in order to maintain its ability to provide safe, reliable and adequate service to its Washington customers, PacifiCorp is proposing to implement revised tariff schedules that effect an increase in prices for Washington retail customers of \$26.7 million.
- 4. The tariff sheets reflect a proposed effective date of January 16, 2004, for the initial price change, which allows the required thirty (30) days notice under RCW 80.28.060

following the submittal of a tariff filing.

- 5. The proposed price increases are based upon normalized Results of Operations for Washington for the test period ending March 31, 2003.
- 6. PacifiCorp is proposing to allocate the revenue increase equally across all customer classes.
- 7. As part of this filing, PacifiCorp is also requesting that the Commission adopt the findings in the report entitled PacifiCorp Prudence Review of Generating Resources Acquired Since 1986 ("Prudence Report"). The Prudence Report, dated December 7, 2001, was developed by representatives of the Company and Commission staff following settlement of the Company's last general rate case in August 2000. The Prudence Report is provided as an exhibit accompanying the direct testimony of Mark Widmer. Included as Chapter V of the Prudence Report, at pages 63-68, is a listing of references relied upon in developing the Report. Although these documents are too voluminous to be included in the direct testimony, copies are available from the Company upon request. In addition, the Company in this proceeding will demonstrate the prudence of additional resources acquired since its last general rate case in Washington.
- 8. Finally, PacifiCorp seeks Commission approval of the proposed interjurisdictional cost allocation protocol ("Protocol"), which describes how PacifiCorp's generation, transmission and distribution costs will be allocated or assigned to PacifiCorp's six retail jurisdictions. The Protocol also describes mechanisms for ensuring continued dialogue among interested parties regarding PacifiCorp's inter-jurisdictional cost allocation issues and procedures for resolving disputes that may arise among the Company's state jurisdictions.
- 9. PacifiCorp's direct case consists of the testimony and exhibits of sixteen witnesses:

- (a) Judith A. Johansen, Chief Executive Officer, presents an overview of the Company's case and provides the context for the testimony of the other witnesses regarding the Company's specific proposals.
- (b) Donald N. Furman, Senior Vice President, Regulation and External Affairs, will present the Company's overall rate of return recommendation, as well as describing the circumstances specific to the Company that justify a slightly higher return on equity than suggested by Dr. Hadaway.
- (c) Samuel C. Hadaway, FINANCO, Inc., will testify concerning the Company's return on equity. Dr. Hadaway's analysis suggests a cost of equity for PacifiCorp of 11.00 percent.
- (d) Bruce N. Williams, Treasurer, who will address the Company's cost of debt and preferred stock. Mr. Williams will show the Company's embedded cost of long-term debt to be 6.51 percent and the embedded cost of preferred stock to be 6.72 percent.
- (e) Andy MacRitchie, Executive Vice President Strategy and Major Projects, who will introduce and provide the history of both the Structural Realignment Proposal and the Multi-State Process, which were used in developing the Protocol.
- (f) Andrea Kelly, Managing Director Major Projects, who will provide the details of the Company's Protocol. Ms. Kelly's testimony will be supported by testimony from Greg Duvall, Managing Director Major Projects, and Dave Taylor, Director of Revenue Requirements. In addition, Mr. Taylor also presents PacifiCorp's functionalized Class Cost of Service Study for Washington based on the test period ending March 2003.
- (g) Mark T. Widmer, Regulation Manager, who will testify regarding PacifiCorp's net power costs, including a description of the calculation of net power costs.

 Mr. Widmer will also address the 2001 Prudence Report.

- (h) Mark Tallman, Managing Director of Trading and Origination, who will provide information regarding the Company's acquisition of two long-term resources: the West Valley lease agreement and the installation of three General Electric LM-600 units at the Gadsby plant site. Mr. Tallman also will demonstrate that these resources were prudently acquired and discuss the system-wide benefits of these resources.
- (i) Ted Weston, Regulation Manager, who will testify regarding the Company's overall revenue requirement and present the Company's normalized results of operations for the twelve months ended March 31, 2003 with limited known and measurable adjustments through March 31, 2004. Mr. Weston will present the normalizing adjustments to actual test period costs related to revenue, operation and maintenance expense, net power costs, depreciation and amortization, taxes and rate base.
- (j) Daniel J. Rosborough, Director of Employee Benefits, who will testify to the Company's increased pension and employee benefit costs. Mr. Rosborough's testimony will describe how this affects PacifiCorp and how PacifiCorp proposes to recover these increased pension and employee benefit-related costs.
- (k) Dawn T. Cartwright, Risk and Insurance Manager, who will testify to the increase in the Company's insurance costs. Ms. Cartwright's testimony will describe how this affects PacifiCorp and how PacifiCorp proposes to recover these increased insurance-related costs.
- (1) William Eaquinto, Vice President of Hydro Licensing, who provides testimony on the Company's actions with respect to the relicensing of the North Umpqua, Bear River and Big Fork hydroelectric projects, and the decommissioning of the Powerdale and American Fork projects. Mr. Eaquinto's testimony demonstrates the prudence of the Company's costs associated with these efforts.

(m) Larry Martin, Tax Director, who will provide testimony to (i) support

recovery of the tax settlement payments the Company has made during the test year in this

case, and (ii) support the recovery of known and measurable costs associated with Internal

Revenue Service settlements that will be paid on or before March 31, 2004.

(n) William Griffith, Director of Pricing, will discuss the Company's

pricing proposals. He will present (i) the Company's proposed tariffs, (ii) the Company's

proposed rate spread and rate design, and (iii) the Company's proposal for the distribution to

customers of the Aquila Hydro Hedge payment.

10. Pursuant to WAC 480-09-330(3), attached as Exhibit A is the Summary

Sheet setting forth the information required to be filed in connection with applications for

general price increases.

DATED: December 16, 2003.

Respectfully submitted,

Stoel Rives LLP

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James M. Van Nostrand

Stephen C. Hall

Of Attorneys for PacifiCorp

PACIFICORP

Appendix A Summary of Requested Electric General Rate Increase

Washington Jurisdiction Filed December 16, 2003

1) The date and amount of the latest prior general rate increase authorized by the Commission.

Date: August 9, 2000.

Amount: \$12.2 million, implemented in three phases over twenty-nine months.

2) Total general business and transportation revenues at present rates and at requested rates.

Present Rates \$198,589,000 Requested Rates \$225,313,000

3) Requested revenue change in percentage, in total and by major customer class

Residential		13.5%
Commercial & Industrial		13.5%
Public Street Lighting		13.5%
	Total	13.5%

4) Requested revenue change in dollars, in total and by major customer class

Residential		\$10,836,000
Commercial & Industrial		\$15,710,000
Public Street Lighting		\$ 178,000
	Total	\$26,724,000

5) Requested rate change in dollars per month, per average residential customer.

Monthly impact at average usage of 1,200 kWhs per month - \$7.45

6) Most current customer count by major customer class.

Residential		98,490
Commercial & Industrial		22,562
Public Street Lighting		3,525
	Total	124,577

Average number of customers – twelve months ended March 2003.

7) Current authorized overall rate of return and authorized rate of return on common equity.

Overall rate of return	10.42%
Rate of return on common equity	13.25%

8) Requested overall rate of return and requested rate of return on common equity, and the method or methods used to calculate rate of return on common equity.

Overall rate of return	8.74%
Rate of return on common equity	11.25%

The methodologies utilized in the derivation of the rate of return on common equity were discounted cash flow analysis, risk premium model analysis as well as a review of the current market, the electric utility industry, and Company-specific factors.

9) Requested capital structure.

Long-term Debt	51.5%
Preferred stock	1.4%
Common Equity	47.1%

10) Requested total net operating income.

Net oper	ating income:	\$ 52,135,000

11) Requested total rate base and method of calculation, or equivalent.

Rate base: \$596,314,000

Method of calculation: Thirteen-month average.

12) Requested revenue effect of attrition allowance, if any requested.

Attrition allowance requested: None.

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of December, 2003, I caused to be served, via Federal Express, a true and correct copy of the PacifiCorp General Rate Case Filing to the following:

Robert D. Cedarbaum Office of the Attorney General 1400 S. Evergreen Park Dr. SW PO Box 40128 Olympia, WA 98504-0128

Melinda J. Davison S. Bradley Van Cleve Davison Van Cleve 1300 S.W. Fifth Avenue, Suite 2915 Portland, OR 97201

Chuck Eberdt, Manager The Energy Project The Opportunity Council 314 E. Holly Street Bellingham, WA 98225

Robert W. Cromwell Jr.
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MS TB-14
900 Fourth Avenue, Suite 2000
Seattle, WA 98164-1012

Danielle Dixon NW Energy Coalition 219 First Avenue South Suite 100 Seattle, WA 98104

Regulatory Operations Coordinator